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**FILED**

SEP 17 2019

UNITED STATES BANKRUPTCY COURT  
SAN FRANCISCO, CA

*Attorneys for Debtors  
and Debtors in Possession*

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).*

Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**STIPULATION AND [PROPOSED] ORDER  
RE: THE PRODUCTION OF THE  
BROWNGREER DATABASE**

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 Pacific Gas and Electric Company and PG&E Corporation (collectively, "the **Debtors**"  
3 and the Tort Claimants Committee (the **"TCC"**) jointly submit this stipulation and proposed order  
4 relating to individual fire related cases in order to further discussions towards consensual  
5 resolution.


6 **STIPULATION**

7 The Debtors and the TCC agree to the following Order in relation to the TCC's production  
8 of BrownGreer database.

9 So stipulated:

10 *September 11*  
11 Dated: ~~August [•], 2019~~  
12 *1100*

CRAVATH, SWAINE & MOORE LLP

13   
14 KEVIN J. ORSINI  
Attorneys for the Debtors

15 *Sept 13, 2019*  
16 Dated: ~~August [•], 2019~~

BAKER & HOSTETLER LLP

17   
18 ROBERT A. JULIAN  
19 Attorneys for Tort Claimants' Committee  
20

21 **IT IS SO ORDERED.**

22 Dated: August [•], 2019  
23

24  
25 Hon. Dennis Montali  
26 Judge of the United States Bankruptcy Court,  
27 Northern District of California  
28